

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS
WESTERN DIVISION

FILED
CLERK
2006 JUL 20 P 4:24

CIVIL ACTION U.S. DISTRICT COURT
NO. 05-30182-MAP

MICHELLE BEEBE,

Plaintiff,

v.

WILLIAMS COLLEGE,

Defendant.

JOINT PROPOSED PRETRIAL STATEMENT

Pursuant to Local Rule 16.1(D), the Plaintiff, Michelle Beebe, and the Defendant, Williams College, submit the following Joint Proposed Pretrial Statement. Counsel for the parties conferred pursuant to Fed. R. Civ. P. 26(f) and Local Rule 16.1(B).

A. Pursuant to Local Rule 16.1(D)(1), the joint discovery plan is as follows:

1. The parties' initial disclosures pursuant to Fed.R.Civ.P. 26(a) shall be served on or before September 1, 2006.
2. All written discovery including depositions shall be completed by January 1, 2007.
3. The Plaintiff will serve disclosures and reports of all expert witnesses required under Fed. R. Civ. P. 26(a)(2) by February 1, 2007, and depositions of the Plaintiff's experts will be completed by March 15, 2007.

4. The Defendant will serve disclosures and reports of all expert witnesses required under Fed. R. Civ. P. 26(a)(2) by April 15, 2007, and depositions of defendant's experts will be completed by June 1, 2007.

B. Pursuant to Local Rule 16.1(D)(2):

1. All motions for summary judgment will be filed by July 1, 2007.
2. Oppositions to any Motion for Summary Judgment will be filed by August 1, 2007. Any Replies to the Oppositions will be filed by August 15, 2007.
3. Should Motions for Summary Judgment not be filed by the above date, or should any such motions be denied by the court in whole or in part, the Court will convene another conference to explore settlement and to establish dates for a final pretrial conference and trial.

C. Pursuant to Local Rule 16.1(D)(3), certifications signed by counsel and an authorized representative of each party will be filed with the Court.

Respectfully submitted,
The Plaintiff, MICHELLE BEEBE
By Her Attorney,

Dated: July 20, 2006

/s/ Thomas J. McCormick
Thomas J. McCormick, BBO # 561760
Heisler, Feldman, McCormick
& Garrow, P.C.
1145 Main Street, Suite 508
Springfield, MA 01103
(413) 788-7988
Fax (413) 788-7996
tmccormick01060@yahoo.com

Respectfully submitted,
The Defendant, WILLIAMS COLLEGE,
By its attorneys,

/s/ Judith A. Malone
Judith A. Malone (BBO #316260)
Patricia M. Higgins (BBO #663318)
Edwards Angell Palmer & Dodge LLP
111 Huntingdon Avenue
Boston, MA 02199-7613
(617) 239-0100
jmalone@eapdlaw.com
phiggins@eapdlaw.com

CERTIFICATE OF SERVICE

I hereby certify that this document(s) filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic File (NEF).

/s/ Thomas J. McCormick
Thomas J. McCormick